



August 15, 2023

VIA ECF

MEMO ENDORSED

The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

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Re: *United States v. Gregoire Tournant*, 22-cr-276 (LTS)

Dear Chief Judge Swain:

Mr. Tournant respectfully submits this letter to request an adjournment of the date on which to file the defense's second set of motions from August 25, 2023 to September 15, 2023. (*See* ECF No. 81 at 31, n. 7.) This is the defense's first request for an extension to file its second set of motions.

The defense makes this request in light of the existing August schedules—both professional and personal—of the relevant team members. Moreover, on August 13, 2023, we received a response from the government to our April 12, 2023 request for a bill of particulars. In light of this, the defense requests additional time to review the government's response and the voluminous discovery it cites, and to confer with the government in an attempt to narrow the issues in dispute prior to filing our second-round motions.

In light of the above, we respectfully request an extension to September 15, 2023. Although the government takes no position on this request, it asked that the following language be included in this letter: "The Government takes no position on the defendant's adjournment request. In particular, the Government defers to the Court on whether an adjournment of three weeks, or a shorter period, will allow for sufficient time for the Government to respond and for the Court to resolve the defendant's pretrial motions, and any motions in limine, in advance of trial in this case, which is scheduled to commence on February 5, 2024."

We appreciate the Court's consideration of this request.

The foregoing request is granted. DE 83 is resolved. SO ORDERED.

8/15/2023

/s/ Laura Taylor Swain, Chief USDJ

Respectfully submitted,

/s/ Daniel R. Alonso

Daniel R. Alonso

cc: Seth L. Levine, Esq. (via ECF)
All Counsel of Record (via ECF)